

May 6, 2010

Ms. Nicole Della Rocco  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00096156

Reference: Amended November Monthly Report (10/1/09-10/31/09), filed 3/2/10  
Honeywell International Political Action Committee (HIPAC)

Dear Ms. Della Rocco:

This letter responds to your Request for Additional Information (RAFI) dated April 2, 2010 asking for clarification as to why all receipts were not disclosed on the original report. While we included an explanatory note about our internal audit on the amended report, we provide the following information surrounding the requirement to amend the original report.

As with most corporate PACs, the payroll department is responsible for collecting the majority of the receipts to be deposited in the PAC account via payroll deduction. The contribution data along with all contributor information needed for reporting is forwarded to PAC personnel and our vendor. This data is then reconciled against deposits made to the bank account to insure that all money is accounted for correctly and that deposits are made on a timely basis.

The additional receipts disclosed on March 2, 2010 were not provided to the PAC with the original receipt data. And because the deposits for these additional funds were in transit, the PAC could not identify that there was a discrepancy at the time we filed the original report. When the payroll department forwarded the additional October data with receipts for a later period, we evaluated it against deposits made and determined that the funds were collected for the PAC and correctly deposited into the PAC. Thus an amended report was in order and we immediately began plans to provide the amendment for the public record. As mentioned in the note included with our amendment, we were in the process of completing an internal audit of the PAC for all of 2009 and found it best to amend all records at one time to most accurately reflect our financial activity for all periods. We provided these amendments as soon as we could in early March.

For your information, during our audit, our vendor also worked with our payroll department to set up a new weekly schedule for collection of data. We have also switched the method of deposit of payroll deductions to wire transfers. These can also be verified on a weekly basis. In this manner, we believe we will be able to catch any omissions by the payroll department in the future. We are now able to see the bank deposits for deductions on-line as soon as they are made and then quickly verify the deposits against the actual deductions collected.

I trust that this serves as an adequate response to your request. If you have any further questions, please feel free to contact me.

Sincerely,

Jason Clifford

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**ETEXT ATTACHMENT**

Treasurer

Honeywell International Political Action Committee (HIPAC)

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